

February 28, 2019

US EPA Region 8
Air and Radiation Program, 8P-AR
1595 Wynkoop Street
Denver, CO 80202-1129

Re: 40 CFR 60, Subpart OOOOa Semi-Annual Report
Ironhorse Complex Gas Plant – Ironhorse II Process Unit
Uintah County, Utah

Dear Sir or Madam:

Andeavor Logistics (ANDX), operator of the Ironhorse Complex Gas Plant in Uintah County, Utah, submits this semiannual monitoring report on behalf of QEP Field Services, LLC as required by 40 CFR §60.636, §60.5420, and §60.5420a. ANDX is providing this report for the Ironhorse II (IH2) process unit. This report covers the period of August 1, 2018 – January 31, 2019.

During the reporting period, the IH2 process unit underwent a component re-inventory project. Andeavor undertook these efforts to ensure that the facility LDAR inventory was accurate and complete. Table 1 summarizes components that were added to the NSPS OOOOa monitoring program as a result of the re-inventory project.

Table 1 NSPS OOOOa Added Components Summary

Component Type	Added Component Count
CLVS-H	62
Connectors	1,054
Pressure Relief Devices	8
Valves	51

During the re-inventory project, two (2) valves were discovered to be incorrectly categorized as connectors and were recategorized in October 2018 and monitored as new components.

The IH2 process unit had a planned full shutdown from November 6 – 13, 2018 as well as a planned partial shutdown from November 26 – 29, 2018. Delay of repair components located within the shutdown area were repaired and monitored as required. No additional components were placed on DOR since the shutdown.

In November 2018, a facility project was executed which added components to the LDAR inventory. Andeavor used a third-party contractor to perform the initial inventory and monitoring. Andeavor identified inconsistencies in the initial inventory and is still in the process of reviewing the data to determine if component identification was missed. Andeavor will provide a summary in the next semi-annual report if there are items that should be communicated to the agency.

Andeavor
1801 California Street
Denver, CO 80202



If you have any questions concerning this report, please contact me by phone at (303) 454-6676 or by email at Heather.L.Vainisi@andeavor.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Vainisi", with a long, horizontal flourish extending to the right.

Heather Vainisi
Supervisor - Environmental